Navy Response to RIDEM Comments on the Draft Final Feasibility Study Report Site 07 - Calf Pasture Point Naval Construction Battalion Center Davisville, Rhode Island

Contract No. N62472-92-D-1296
Contract Task Order No. 32

Prepared for

Department of the Navy
Northern Division
Naval Facilities Engineering Command
10 Industrial Highway
Mail Stop No. 82
Lester, Pennsylvania 19113-2090

Prepared by

EA Engineering, Science, and Technology
Sharon Commerce Center
2 Commercial Street, Suite 106
Sharon, Massachusetts 02067
(617) 784 - 1767

28 May 1997
29600.32.3495

Navy Responses to RIDEM's Review Comments
Draft Final Feasibility Study, IR Program Site 07, Calf Pasture Point
Naval Construction Battalion Center
Davisville, Rhode Island

INTRODUCTION

This document contains the Navy's responses to the RIDEM's comments provided 21 May 1997 on the following documents:

"Draft Final Feasibility Study Report, Site 07 - Calf Pasture Point, Naval Construction Battalion Center, Davisville, Rhode Island", April 1997

"Navy Response to RIDEM Comments on the Draft Feasibility Study Report, Site 07 - Calf Pasture Point, Naval Construction Battalion Center, Davisville, Rhode Island", April 1997

RESPONSE TO COMMENTS

Comment #1: The RIDEM Water Quality Regulations for Water Pollution Control are an ARAR for this site. Specifically, Sections 7.2 (Discharges Shall Not Further Degrade Low Quality Waters) and 7.4 (Class A and SA Waters) apply. Section 7.2 states that no discharge of pollutants shall be allowed which would cause or result in additional degradation of State waters even if they currently do not meet their designated classifications. Section 7.4 states that no new discharges will be permitted in to class A or SA waters or lesser class waters which have attained class A or SA quality.

The waters under Calf Pasture Point are classified as GB, however, surface waters which have not been specifically classified are considered Class A (Section 6.4). This would include wetlands on Calf Pasture Point (Section 5, Waters of the State). In addition, both Allen Harbor and Narragansett Bay are currently classified as SA.

Therefore, based on the above, the Water Quality Regulations are and ARAR and should be considered as part of the final selection of an alternative since contamination has the potential to migrate from the site.

Response: *The RIDEM Water Quality Regulations for Water Pollution Control will be included as an ARAR for this site. The conceptual long-term monitoring plan (LTMP) for Site 07 (attached) includes monitoring along the shoreline of Calf Pasture Point and will provide data to be used to evaluate whether the VOC plume may adversely impact water quality within Allen Harbor.*

At the 16 May 1997 BCT meeting, RIDEM informed the Navy that these

regulations will likely be revised by the end of 1997. Because this will likely occur after the Record of Decision for Site 07, the Navy will continue to consider the existing regulations as an ARAR.. The applicability or relevance and appropriateness of any modifications to the regulation will be considered when available.

Comment #2: The monitoring plans proposed with the action alternatives (2 thru 6) include only groundwater testing. To insure that the identified plumes detected at Calf Pasture point are not impacting class A and SA waters RIDEM will additionally require that sediments and surface waters also be sampled as part of the monitoring plan. This would include sediments adjacent to Calf Pasture Point as well as surface water bodies and sediments within Calf Pasture Point. The specific details of the monitoring plan can be worked out during the design phase, however, the Feasibility Study should be modified to include sediment and surface water monitoring as part of the description of the monitoring plan for the alternatives.

Response: *It is unlikely that monitoring shoreline surface water and/or sediment is going to provide useful data which will ensure that the plume is not adversely impacting the harbor quality. Allen Harbor has two daily tidal cycles with a change in sea level of 3 to 5 ft. The entrance channel, in particular, is therefore subject to a dynamic turnover of water volume as well as sediment deposition/erosion. VOC in surface water are likely to be diluted, volatilized, and carried in/out with the tides such that most samples will be non-detect. Furthermore, any detections will be difficult to attribute to Site 07 due to the multiple potential offsite sources from the bay and harbor (e.g., recreational boating activity, the presence of two marinas in the harbor, the stormwater discharge at the southern end of the harbor, overland runoff from Spink Neck and the landfill area, etc.). Therefore, the Navy's conceptual LTMP (attached) includes evaluating ground-water samples from shoreline monitoring wells and seep samples from the shoreline instead of surface water and sediment samples. If a trend of increasing COC concentrations is identified in those wells, then the investigation could be expanded accordingly. As described in the attached conceptual LTMP and as agreed to during the 16 May 1997 BCT meeting, final details of the LTMP will be resolved during the Design Phase.*

Comment #3: The monitoring plans within the Feasibility Study state that groundwater would be tested once every six months. Typically, when RIDEM initiates a monitoring plan, groundwater is monitored on a quarterly basis in the beginning. After sufficient data has been obtained that would show a decreasing trend in the data, the frequency of sampling could be reduced. Similarly, the same criteria would apply to surface waters. Sediments could be initially sampled on a twice yearly basis (preferably during high and low water tables).

Response: *The Navy's conceptual LTMP (attached) includes quarterly monitoring for the first year with reduced monitoring frequency thereafter, if appropriate. The scope and frequency of the LMTP will also be reevaluated periodically. Based on the low site risks, the Navy believes that this conceptual LTMP will be protective of human health and the environment. See response to comment #2 regarding shoreline sediment sampling. As described in the attached conceptual LTMP, sediment sampling within the interior wetlands may be performed if adjacent shallow monitoring wells indicate a potential for discharge of VOC to the wetlands. Historic data from MW07-13S and nearby former hydroprobe locations (which have been non-detect for VOC) indicate that VOC are not discharging to the wetland. As described in the attached conceptual LTMP and as agreed to during the 16 May 1997 BCT meeting, final details of the LTMP will be resolved during the Design Phase.*

Comment #4: RIDEM reiterates its concern that geologic information about Allen Harbor is necessary in this case to locate possible discharge points for the contaminated plume under Calf Pasture Point.

Response: *As outlined in the attached LTMP and discussed at the 16 May 1997 BCT meeting, potential discharge points will be evaluated using shoreline monitoring wells, hydroprobes (or passive sampling techniques), and seep sampling. If a trend of increasing VOC concentrations is observed in shoreline monitoring points, then the LTMP could be expanded further into the harbor. As described in the attached conceptual LTMP and as agreed to during the 16 May 1997 BCT meeting, final details of the LTMP will be resolved during the Design Phase.*